

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Belmont Community Media Center, Inc. (Belmont Media Center)**

Belmont Media Center submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Belmont Media Center is an independent non-profit 501(c)(3) organization that is contracted to operate a community media center for the Town of Belmont, MA.

We are dedicated to providing the base necessities for functioning local community media – physical space, paid & volunteer staff, modern TV production/cablecasting equipment, local governance, broad multimedia training & education.

1. Comcast & Verizon provide three cable channels for use by BMC for public, educational, & government (**PEG**) access TV programming.
2. These channels are placed on the lowest tier of cable TV service provided in Belmont. If residents have analog television sets they require a digital converter box to receive this basic service.
3. Neither Comcast nor Verizon allows for distribution of our local programming schedule over either company’s on-screen program guide; even though we can provide all necessary data required for inclusion on Verizon’s or Comcast’s on-screen program guide which is easily accessible to all basic cable TV subscribers (To view our programming schedule, Belmont residents must watch for the schedule on the channels’ “electronic bulletin boards”; access the

schedule on our website on the Internet, or subscribe to the local newspaper)

5. Belmont, MA is not an AT&T U-Verse community.

6. **PEG** programming in Belmont, MA has grown in utilization, viewership, relevance, variety, and quality. We have seen consistent improvements across the board since we began operating full-time in 2006. These improvements can be tied directly to a few factors.

- Firstly, management of the PEG facility moved from control of the initial single cable provider (Comcast) to local independent nonprofit control (BMC).
- Second, we are located in a MA, a state that has largely been able to preserve local control of local rights of way. Unlike other states where long-standing legislative frameworks that provided for local access TV channels, facilities and technology have been eliminated through incremental legislative changes; and this during a time period of steady growth of “local” or “hyper-local” electronic media.
- Thirdly, we have embraced the concept and Belmont residents’ usage of our PEG access TV center as a “community media center.” Television today is not limited to the parameters that defined it and confined it even six years ago, when BMC started.
 - A modern hyper-local community media center needs to embrace all forms of multimedia production & distribution; thus the legislative framework and financial support for this public good should be provided by similar revenues generated by internet providers and traffic over those same public rights of way and wires that distribute cable TV services.

Jeffrey Hansell, Executive Director

Belmont Media Center

9 Lexington Street

Belmont, MA 02478

617-484-2443

jeff@belmontmedia.org